

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

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NICHOLAS MCKEE, Individually and on :  
Behalf of All Other Persons Similarly Situated, :  
Plaintiffs, : NO. 1:12-cv-01117-SLR-SRF  
-against- :  
PETSMART, INC., :  
Defendant. : JURY TRIAL DEMANDED  
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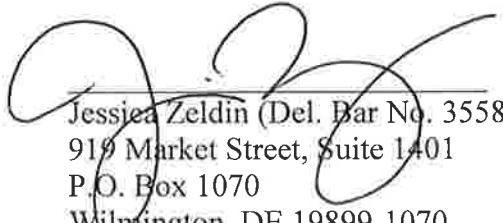
**PLAINTIFF'S MOTION FOR APPROVAL OF COLLECTIVE ACTION  
SETTLEMENT, FOR AWARD OF ATTORNEYS' FEES AND EXPENSES AND FOR  
PAYMENT OF THE CLAIMS ADMINISTRATOR'S COSTS AND EXPENSES**

Plaintiff NICHOLAS MCKEE, by and through his counsel, hereby moves the Court for an order granting approval of the settlement of this collective action, awarding attorneys' fees and expenses to Plaintiffs' Counsel, approving payments to the Claims Administrator, and providing for the relief detailed in the Proposed Final Order and Judgment submitted herewith, together with any other relief that this Court finds to be just, proper and equitable. Specifically, Plaintiffs and Plaintiffs' Counsel seek:

- (1) Approval of the Settlement;
- (2) Approval to pay the Claims Administrator, The Garden City Group, in an amount not to exceed \$80,000.00;
- (3) An award of attorneys' fees in the amount of \$1,266,266.67 (one third of the Total Settlement Amount) and expenses in the amount of \$245,820.45; and
- (4) Entry of the Proposed Final Order and Judgment.

Defendant has indicated its consent to the entry of the Proposed Final Order and Judgment.

ROSENTHAL MONHAIT & GODDESS, P.A.



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